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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTOPHER O. SMITH,

Petitioner,

vs.

JERRY HOWELL, et al.,

Respondent(s).

Case No. 2:20-cv-01108-CDS-DJA

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
ANSWER TO FIRST AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 13)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 45 days from the current due date of August 26, 2022, up to and including October 10, 2022, in which to file their Answer to the First Amended Petition for Writ of Habeas Corpus (ECF No. 13). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: August 26, 2022.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jaimie Stilz
Jaimie Stilz (Bar. No. 13772)
Deputy Attorney General

DECLARATION OF JAIMIE STILZ

I, JAIMIE STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Christopher O. Smith v. Jerry Howell, et al.*, Case No. 2:20-cv-01108-CDS-DJA, and as such, have personal knowledge of the matters contained herein.

2. This is my second request for an extension to file the Answer to the First Amended Petition, and this Motion is made in good faith and not for the purpose of delay.

3. The Answer to Petitioner's First Amended Petition for Writ of Habeas Corpus (ECF No. 13) is currently due on August 26, 2022.

4. I am unable with due diligence to timely complete the Answer herein. I am still getting caught up from my recent bout of COVID-19, as well as attempting to manage ongoing health issues. I have been diligently striving to resolve and/or work around these health issues but they have significantly impacted my ability to complete the Answer in a timely fashion, thus necessitating an extension.

5. I have spoken to counsel for Smith, and he does not oppose this request.

6. Based on the foregoing, I respectfully request an enlargement of time of 45 days, up to and including October 10, 2022, to file the Answer to the First Amended Petition (ECF No. 13).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 26th day of August, 2022.

/s/ Jaimie Stilz
Jaimie Stilz (Bar No. 13772)
Deputy Attorney General

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: August 29, 2022

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on this 26th day of August, 2022, I served a copy of the foregoing *Unopposed Motion for Enlargement of Time to File Answer to First Amended Petition for Writ of Habeas Corpus (ECF No. 13) (Second Request)*, by U.S. District Court CM/ECF electronic filing, to:

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/s/ C. Martinez
An employee of the Office of the Attorney General